

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

In re: NEXIUM (ESOMEPRAZOLE)
ANTITRUST LITIGATION

MDL No. 2409

Civil Action No. 1:12-md-02409-WGY

This Document Relates To:

All Actions

DECLARATION OF THOMAS M. SOBOL

I, Thomas M. Sobol, hereby depose and state under oath as follows:

1. I am a member of the bar of the Supreme Judicial Court of Massachusetts and a member of the bar of the United States District Court for the District of Massachusetts. I am a partner with the law firm of Hagens Berman Sobol and Shapiro LLP. This Court has appointed me as liaison and co-lead counsel for the direct purchaser plaintiff class in the matter, *In re: Nexium (Esomeprazole) Antitrust Litigation*, MDL No. 2409, Civil Action No. 1:12-md-024909 (WGY), United States District Court for the District of Massachusetts.

2. I provide this declaration in support of Plaintiffs' Motion to Compel Defendant Ranbaxy to Make a Limited Supplemental Production of Documents.

3. Attached hereto as Exhibit A is a true and accurate copy of Plaintiffs' First Request for Production of Documents to All Defendants, dated November 21, 2012.

4. Attached hereto as Exhibit B is a true and accurate copy of Plaintiffs' Second Request for Production of Documents to All Defendants, dated May 1, 2013.

5. Attached hereto as Exhibit C is a true and accurate copy of Plaintiffs' Third Request for Production of Documents to All Defendants, dated July 12, 2013.

6. Attached hereto as Exhibit D is a true and accurate copy of an e-mail from Marta Markowski to Nexium counsel of record, dated December 2, 2013.

7. Attached hereto as Exhibit E is a true and accurate copy of a letter from Christopher Letter to Danielle R. Foley, dated May 21, 2014.

8. Attached hereto as Exhibit F is a true and accurate copy of a letter from Danielle R. Foley to Christopher Letter, dated June 10, 2014.

9. Attached hereto as Exhibit G is a true and accurate copy of a letter from Danielle R. Foley to Christopher Letter, dated July 11, 2014.

10. Attached hereto as Exhibit H is a true and accurate copy of email correspondence between Christopher Letter and Danielle R. Foley, dated July 17, 2014.

11. Attached hereto as Exhibit I is a true and accurate copy of a letter from Danielle R. Foley to Christopher Letter, dated July 30, 2014.

Executed this 19th day of August, 2014 under the pains and penalties of perjury.

/s/ Thomas M. Sobol
Thomas M. Sobol

CERTIFICATE OF SERVICE

I, Thomas M. Sobol, hereby certify that I caused a copy of this declaration and the attached Exhibits A through I to be filed electronically via the Court's electronic filing system on August 19, 2014. Those attorneys who are registered with the Court's electronic filing system may access these filings through the Court's system, and notice of these filings will be sent to these parties by operation of the Court's electronic filing system. Unredacted copies of Exhibits D, F, G and I will also be sent via e-mail on all counsel of record.

/s/ Thomas M. Sobol
Thomas M. Sobol